



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 7, 2021

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Navarro et al.*, 20 Cr. 160 (MKV)

Dear Judge Vyskocil:

The Government respectfully writes in advance of the upcoming status conference in the above-captioned case, scheduled for May 14, 2021, to provide the Court with a summary of a conference call held with certain representatives of the remaining defendants in this matter. On the call, representatives of the defendants requested to adjourn the date for filing of motions to suppress evidence until August 27, 2021, due to trial conflicts (for certain defense counsel) and the continued need to review discovery. The Government has no objection to that request, and has requested, in light of the number of motions previewed by defense counsel, 60 days to respond to the defendants' motions to suppress. Defense counsel has requested thirty days for a reply, and the Government has no objection to that request.

The parties further conferred on the matter of expert disclosures and timing for any motions relating to the preclusion of proposed experts. The Government has to date identified two experts and provided summary reports relating to their anticipated testimony. No defense experts have yet been identified. The Government has proposed that experts will be noticed to opposing counsel no later than the close of the briefing schedule relating to motions for suppression, and that motions relating to expert preclusion will be filed concurrent with motions *in limine* in advance of each respective trial grouping, as those schedules are set. Representatives of the defense have asked that deadlines for expert disclosures and motions *in limine* be set at the subsequent conference to be held in the Fall of 2021.

Finally, the parties jointly request that the upcoming status conference be convened remotely, rather than in person, in light of the number of defendants and attorneys necessary to

proceed and the fact that many defendants and counsel would be required to travel from outside of New York State.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/ Andrew Adams
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Assistant United States Attorneys